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August 9, 2024

VIA E-FILING

Hon. Karin J. Immergut  
United States District Court  
District of Oregon  
Mark O. Hatfield United States Courthouse, Room 1307  
1000 Southwest Third Avenue  
Portland, OR 97204-2946

Re: ***In Re Petition of Novalpina Capital Partners I GP S.a.r.l. for Judicial Assistance  
Pursuant to 28 U.S.C. § 1782, 23-mc-0082-IM***

Dear Judge Immergut:

On behalf of Intervenor Treo Asset Management LLC and Treo NOAL GP (collectively, “Intervenors”), we write to advise the Court that Intervenor is filing today, in the Ninth Circuit Court of Appeals, (1) an emergency motion under Ninth Circuit Rule 27-3(a) for an administrative stay of this Court’s Order dated July 30, 2024 (Dkt. 64) and (2) a motion for a stay pending appeal pursuant to Federal Rule of Appellate Procedure 8.

Intervenors have done so out of an abundance of caution, given that absent at least a temporary stay, Respondents will be required to make document productions pursuant to the existing protective order on or before August 14. Moreover, given the briefing schedule set on Intervenor’s motion for a stay pending appeal made to this Court (Dkt. 65), there might otherwise be insufficient time to seek relief from the Ninth Circuit should this Court deny that motion. Intervenor has disclosed to the Ninth Circuit that there is a motion for a stay pending appeal currently pending before this Court as well. Should this Court grant the relief sought by Intervenor, Intervenor will immediately withdraw their motions before the Ninth Circuit.

Respectfully submitted,

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